

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA

Gregory Hunt 358907

[Enter the full name of the plaintiff in this action]

Civil Action No. _____

(to be assigned by Clerk)

COMPLAINT
State Prisoner

v.

Willie J Eagleton Warden

Annie Sellers associate warden

Captain Edge

Lieutenant Moultrie

Ms. Buchanan Food Service

[Enter above the full name of defendant(s) in this action]

Defendant Ms Leak Food service

I. PREVIOUS LAWSUITS

A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise related to your imprisonment? Yes _____ No ☒

B. If your answer to A is Yes, describe the lawsuit in the space below. If there is more than one lawsuit, describe the additional lawsuits on another piece of paper using the same outline.

1. Parties to this previous lawsuit:

Plaintiff: _____

Defendant(s): _____

2. Court: _____

(If federal court, name the district; if state court, name the county)

3. Docket Number: _____

4. Name(s) of Judge(s) to whom case was assigned: _____

5. Disposition: _____

(For example, was the case dismissed? Appealed? Pending?)

6. Approximate date of filing lawsuit: _____

7. Approximate date of disposition: _____

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USDC CLERK, LEXINGTON, SC

II. PLACE OF PRESENT CONFINEMENT

- A. Name of Prison/Jail/Institution: EVANS Correctional
- B. What are the issues that you are attempting to litigate in the above-captioned case? Rape, assault & battery in the presence of SCDC employ, discrimination, verbal threats
- C. (1) Is there a prisoner grievance procedure in this institution? Yes ☒ No ☐
(2) Did you file a grievance concerning the claims you are raising in this matter? Yes ☒ No ☐
When the end of June Grievance Number (if available) _____
- D. Have you received a final agency/departmental/institutional answer or determination concerning this matter (i.e., your grievance)? Yes ☐ No ☒
- E. When was the final agency/departmental/institutional answer or determination received by you? _____
If possible, please attach a copy of your grievance and a copy of the highest level decision concerning your grievance that you have received.
- F. If there is no prison grievance procedures in this institution, did you complain to prison, jail, or institutional authorities? Yes ☐ No ☐
- G. If your answer is YES:
1. What steps did you take? _____
 2. What was the result? _____

III. PARTIES

In Item A below, place your name, inmate number, and address in the space provided. Do the same for additional plaintiffs, if any.

- A. Name of Plaintiff: Gregory Hunt Inmate No.: 358907
Address: F4-A-186, 610 Hwy 9 West, Bennettsville SC 29512

In Item B below, place the full name of the defendant, his official position, and place of employment in the space provided. Use Item C for additional defendants, if any.

- B. Name of Defendant: Willie Eagleton Position: Warden
Place of Employment: EVANS CI

- C. Additional Defendants (provide the same information for each defendant as listed in Item B above):

Annie Sellers, associate Warden, Evans CI : Captain Edge security Evans CI
Lieutenant Moultrie, security, Evans CI; Ms Buchanan, Food service director
Evans CI, Ms Leak Food service Evans CI

IV. STATEMENT OF CLAIM

State here, as briefly as possible, the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach an extra sheet if necessary.

This is a rape that has been covered up since August 2014. I started work in the cafeteria last year and was a line server. Lamont Montgomery AKA Gator got Ms Buchanan to move me to a cook position. Soon after inmate Montgomery catches me in the restroom and tells me if I want to live I'll do as he says. Montgomery is 6'4" 250 a muscular male, I'm 5'6" 150 small frame male. He starts by making me give him oral sex that day. The threats and rapes lasted until Dec. 2014 when inmate Montgomery choked me in the dining hall until near unconsciousness with Lt Moultrie present. Lt. Moultrie seen Montgomery attack me, this attack lasted several minutes. It was no horse playing. Finally LT Moultrie told Montgomery that's enough. He didn't pepper spray, handcuff or write inmate Montgomery up. It was as if Lt. Moultrie was scared. I was sent to my dorm and Sgt Thomas said he was sending me to medical because of the bruises around my neck. While at medical Ms Sellers was called and she had photos taken of my neck, I told her what happened but my attacker still had not went to lock up. The next Captain Edge comes to the cafeteria and makes me sign protective Custody papers. Still my attacker has not went to lock up. I was fired that week by Ms Buchanan but Montgomery still had his job. Ms Buchanan and inmate Montgomery are very friendly together. She has his birthday circled on her calendars with smiley faces saying Gators birthday. This type of relationship is against SCDC policy. A friend wrote on the Kiosk telling Ms Buchanan what Montgomery was doing to me August of 2014. She responded back to Shawn Werts misuse of Kiosk and that she would charge him if he wrote anything else. If Ms Buchanan would have called investigator Brackenberry to investigate this it would have saved me from five

IV. STATEMENT OF CLAIM - continued.

months of threats to my life, shame, humility, the pain I went through and the suffering I still go through. She knew of his background. Montgomery has a history of this type of behavior. She moved me off the line so he could do as he pleased with me. Before I was fired this Leak was our supervisor. I was in the restroom when inmate Montgomery bullied his way in and forced himself inside me and when he finished I was left crying on the floor with blood, feces and semen running out of me. I threw my underwear in the restroom trashcan and cleaned up the best I could and tried to go back to work. Ms Leak seen me and sent me to the dorm, but still Montgomery had free reign of the kitchen. I had 2 other inmates try to help me get help from outside agencies, both were threatened by inmates and administration but finally Charie Cox a agent from the Office of The Inspector General came and seen me June 20th and I told him of some of the things that Montgomery done to me. Montgomery had striped me of all my dignity and replaced it with shame and humility. My pride was all I had left and it hurt too bad to tell the 2 agents of what I had been through. What little I told them still put the rapist in lock up away from me. I want the 2 agents to come back so I can tell them all that went on in the 5 months. I've wrote Warden Eggleston request, he knows what happened to me but refuses to answer me. I've wrote mental health they won't answer. I've wrote SCDC Headquarters request to staff with no answers. I tried to contact the investigator here and she answered me but ask me to elaborate more on what I need. Everybody can see what I write on the kiosk and I've been humiliated enough, ridiculed enough by other inmates. I can't sleep at night, thinking Montgomery may have given me a ~~disease~~ disease. I cry for no obvious reasons now. I need help and SCDC does not seem to care.

V. RELIEF

State briefly and exactly what you want the court to do for you.

Buchanan needs to be held accountable for not acting on the request to staff from Shawn Werts letting her know of what was happening to me in the kitchen, she needs to be held accountable for having inmate relations. This P.R.E.A. issue should have been investigated after she knew. The rumors should have been enough for her to call the investigator.

Annie Sellers needs to be held accountable, she seen my neck how bad it was and had photos taken, but she refused to get the investigator involved and did not charge the attacker and lock him up

Captain Edge need to be held accountable, he knew of the assault seen the pictures, didn't lock him up and didn't get the investigator involved

Lt. Moultrie should be fired for putting my life in danger he should have stop the assault the first time Montgomery stopped me, Lt. Moultrie let the attack go for several moments before saying that's enough, he violated protocol and policy by not stopping the attack. Ms Leak knew the rumors of me being raped and just sent me to the dorm with my pants a ~~very~~ bloody mess, she to did not call the investigator so she should be held accountable
Warden Eagleton is the immediate supervisor of all involved and has actively been cover this all up so he to need to be held accountable. I need counseling and mental health treatment and be tested for diseases, and for all of these people to stop making threats against me. I also want to speak to investigator Brackenberry.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 27 day of September, 2015.

X [Signature] 358407

Signature of Plaintiff